

8/18/09

EPA Revised
Comments on Proposed Plan Approval
40-328-006 for UGI Development

Response to August 4, 2009 Response

1. Assuming the electricity or steam from Units 1-3 and Unit 4 is not sent to a common source, these Units do appear to be separate facilities under Title V.
2. While this does clarify our previous question, the NSPS includes no exemption for startup, shutdown, or malfunction and, requires good air pollution control practices for minimizing emissions at all times including during startup, shutdown, and malfunction (40CFR 60.4333). Thus, condition #007 for Section E, source Group 1 should be removed.
3. Response is considered complete.
4. Response is correct, our comments were incorrect.
5. The revised table answers our question.
6. Information provided for question #3 answers our question.
7. Response is accepted. Subpart YYYY should be included in the Permit Review Memo with a similar explanation as to why it does not currently apply.

Additional Comments

Permit Review Memo

Page 9 - Par 3, it appears that "Unit #6" in this paragraph should be replaced with "Unit #3."

NSPS Subpart Kb – No reference to this requirement is included in the Review Memo, yet the permit includes numerous Kb requirements. Is Subpart Kb actually applicable? If so, the Permit Review memo should discuss it and why it applies. If not, the requirements that are listed in the permit should be removed.

Proposed Plan

1. VE testing - The Proposed Plan lists two different and inconsistent opacity measuring limits; See Section C Condition #014 and Section E, Source Group 1, Condition #003.
2. Recordkeeping – How are the records of monthly emissions listed in Section C, Condition #019 to be generated? NSPS KKKK monitoring and recordkeeping requirements only cover NO_x and SO₂.
3. General Permit – Section D, 49.9 MM BTU/Hr Boiler – Specific citations for the General Permit should be included for each applicable requirement listed in this Section. Inapplicable parts of the General Permit should not be included, such as:
 - a. Condition #001, par 3 references to permits other than Title V,

- b. Condition #002 last sentence, and
- c. Condition #013 in entirety.

Condition #003 is a Recordkeeping/Reporting Requirement and should be moved to one or both of those sections

Condition #006 refers to Condition #017 for each boiler. Where is this condition?

4. Section D, 500,000 gal distillate fuel tank - Even if NSPS Subpart Kb applies, Condition #006 should be deleted as it is not a permit condition.
5. Section E, Source Group Combustion Turbines w HRSG, Condition #015 – Please identify the units to which this condition applies.
6. Section E, Subpart KKKK Turbine NSPS - Inapplicable parts of this NSPS should be removed. For example:
 - a. Condition #001 – last three paragraphs
 - b. Condition #003 – two paragraphs that apply to turbines with NOx standard >15ppm

Condition #002 should be moved to the Monitoring Section.

Condition #008, last paragraph (b) – Please identify which units may be covered.